

Robert Tenorio Torres
Attorney at Law
1st Floor, D'Torres Bldg.,
P.O. Box 503758
Saipan, MP 96950

Tel: (670) 233-7859
Fax: (670) 233-5749

Attorney for: Yu Suk Chung

FILED
Clerk
District Court

OCT 27 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

**IN THE DISTRICT COURT FOR THE
THE NORTHERN MARIANA ISLANDS**

YU SUK CHUNG,

Plaintiff,

vs.

**WORLD CORPORATION, a
CNMI corporation
Defendant.**

Civil Action No. 04-0001

**PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS TO
THE JURY**

Plaintiff, by and through counsel Colin Thompson and Robert Torres,
hereby proposes the following voir dire questions for the jury.

Robert Tenorio Torres

Attorney at Law

1st Floor ~ D'Torres Building ~ Garapan

P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 Where do you work?

2 What job title do you hold?

3 What duties do you perform at work?

4 Do you like your job?

5 If not, why?

6 Have you ever gone to college?

7 If so, did you earn a degree and/or certificate?

8 What did you want to accomplish with a degree or certificate?

9 Did you receive any promotions in work because of degrees or certificates earned?

10 If so, please tell us about them.

11 Where does your spouse/significant other work?

12 What job title does he/she have?

13 Does he/she like his/her job?

14 Do any of you, your family or close friends work in the hotel and/or tourism industry?

15 If so, please tell us about your/their work.

16 Are you or any member of your family or close friends involved with bringing foreign investors/investment to the CNMI?

17 If so, please explain how you/they are involved with foreign investment.

Robert Tenorio Torres

Attorney at Law

1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 Do any of you, your family or close friends work for the former Diamond
2 Hotel, now World Resort, World Corporation, or World Construction?

3 If so, what position do you/they hold?

4 How long have you/they held that position?

5 Does anyone on the jury know any of the following individuals:

6 Yu Suk Chung?

7 Employees of World Resort, World Corporation or World Construction?

8 Any of the Attorneys?

9 Any of the witnesses (see pretrial order)?

10 Has any member of the jury, or a family member or close friend ever been
11 involved in a lawsuit?

12 If so, what type of lawsuit?

13 Were you/they satisfied with the outcome?

14 Do you feel that the outcome was fair?

15 Why or why not?

16 What do you think of the job that your/their lawyer did?

17 Has any jury member, or a family member or a close friend ever had to
18 testify in Court or at a deposition?

19 What were the circumstances?

20 How did you/they feel about testifying?

Robert Tenorio Torres

Attorney at Law

1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 Do any of you, or your family or close friends work or have experience in
2 the legal field or court system?

3 Please tell us about your/their experience.

4 Do any jurors believe that it is wrong, or improper for a person to bring a
5 lawsuit?

6 Have any of you ever sat as a juror before?

7 If so, how many times and when?

8 Please give details of each occasion, such as whether it was a civil or
9 criminal trial, etc.

10 What did you think about your experience as a juror?

11 What did you like best?

12 What did you like least?

13 Is there anything about that experience that you think might influence the
14 way you think about this case?

15 Do you think that there was anything that could have been done to improve
16 your experience? (by the court, lawyers, others?)

17 Has any member of the jury had any unpleasant associations with lawyers,
18 judges or the courts?

19 If so, who and under what circumstances?

20 Would that experience interfere with your ability to decide this case?

21 Do any of you subscribe to a newspaper or magazine—or even if you don't
22 subscribe, is there a publication you read pretty regularly?

23 Which ones?

Robert Tenorio Torres

Attorney at Law

1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 What do you enjoy about that publication?

2 How do you prefer to get your news? TV, newspaper, radio, or word of
3 mouth?

4 What do you like about that particular method of getting news?

5 Do any of you belong to any clubs or organizations? (Including book clubs,
6 neighborhood watch, sport or racquet clubs, business associations?)

7 What kind of clubs or organizations?

8 How active are you?

9 Do you ever go out to eat?

10 If so, what type of food do you prefer?

11 Ever eat at a Chinese restaurant? Japanese? Korean?

12 Has anyone in the jury traveled off-island?

13 If so, how frequently? Where?

14 Do you enjoy traveling?

15 Do you travel for business or pleasure?

16 What hardships have you experienced while traveling?

17 Have you ever had any bad experiences with losing luggage or documents?

18 Did that change the way you think about traveling?

19 Do any of you have any background in management?

20 Do you think that managers and CEOs or presidents of companies are over-
21 paid?
22
23

Robert Tenorio Torres
Attorney at Law
1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

- 1 What do you think is a reasonable amount for a manager to be paid?
- 2 Do you think managers that are residents of the CNMI should be paid more
- 3 than non-resident managers?
- 4 Do you think having a college degree or certificate should be a factor in
- 5 how much a manager is paid?
- 6 Have you ever been in a position to hire or fire a person in your workplace?
- 7 What do you think is a good reason to fire a person from a job?
- 8 Should jobs have probationary periods?
- 9 How many chances do you think a person should get before they are fired?
- 10 Have any of you or members of your family or close friends ever been
- 11 terminated from a job?
- 12 If so, what happened?
- 13 Did you/they find another job easily?
- 14 Was the replacement job as good as or even better than the job you/they
- 15 were terminated from?
- 16 Do you believe your experience will influence how you might look at this
- 17 case?
- 18 Has any member of the jury ever had to move his/her family off-island or
- 19 on-island?
- 20 If so, why? For a job?
- 21 What kind of experience was that?
- 22 Was it hard on your family?
- 23

Robert Tenorio Torres

Attorney at Law

1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

- 1 Do you think non-resident workers have similar experiences?
- 2 Do you think it is as hard to move on/off-island for non-residents of the
- 3 CNMI?
- 4 What is your opinion of non-resident workers?
- 5 Do you think non-resident workers are taking jobs from the local population
- 6 in the Northern Mariana Islands?
- 7 Do you think non-resident workers should hold management positions in
- 8 businesses in the CNMI?
- 9 Has any member of the jury ever stayed at World Resort?
- 10 Have you ever eaten at any restaurants at World Resort?
- 11 If so, what kind of experience did you have there?
- 12 Has any member of the jury ever seen an article about World Resort, World
- 13 Corporation, or World Construction in the newspaper?
- 14 What was the substance of the article?
- 15 What was your reaction?
- 16 Did the article change the way you think about World Resort or World
- 17 Corporation?
- 18 If so, in what way?
- 19 Would this affect how you would look at this case?
- 20 Do you think the laws of the CNMI should be followed by foreign citizens
- 21 as well as US citizens and residents of the islands?
- 22 Should foreign citizens be held to a higher standard of law while in the
- 23 CNMI?

Robert Tenorio Torres
Attorney at Law
1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 Do you think punishments should be the same if a foreign citizen breaks a
2 CNMI law?

3 Is not being aware of a law an excuse to break it?

4
5 If a person does not know that it is illegal to fish at Managaha and they are
6 caught fishing there, should they be fined?

7 If a company does not know that it is illegal to hire a non-resident worker
8 without the Department of Labor's approval, should they be punished when
9 they hire a non-resident worker without clearing the worker through Labor?

10 Do you think companies should know the law better than the average
11 person?

12 Should there be a different standard for companies in following the law?

13 Do you have any feelings about the maximum amount you would be willing
14 to award somebody for an injury or wrongful termination?

15 Do you feel that the spouse of a man/woman injured by another's conduct
16 should be monetarily compensated for their loss, as defined by our law?

17 Do you feel that there should be a law that limits the amount of damages,
18 which a jury can award in any employment action either to compensate the
19 victim or to compensate his/her loved ones for his/her injury?

20 Do you feel that it might be too easy for someone to sue and get big verdicts
21 in our courts?

22 Do you feel that there are too many unjustified employment lawsuits in our
23 courts?

Do you feel that employment lawsuits have a negative impact on people or
society or the economy in general?

Would you be reluctant to award a verdict against a business based upon or

Robert Tenorio Torres

Attorney at Law

1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 supporting tourism?

2 Would the fact that a business is based upon or supporting tourism in the
3 CNMI influence the amount of award you gave in a verdict?

4 Does the fact that World Corporation is a foreign investor make you
5 reluctant to award a verdict against them?

6 Would you be less inclined to award a large verdict against World
7 Corporation if that verdict would impact future investment by World
8 Corporation?

8 Do you feel that employment lawsuits harm foreign investment or investors
9 in the CNMI?

10 Do you think lawsuits discourage foreign investors from coming to Saipan?

11 Do you feel access to our courts should be limited to persons born in the
12 United States?

13 Do you think that a Korean citizen is less entitled to the protections of US
14 and CNMI laws than a US citizen?

15 Do you think that non-US citizens should be treated the same as US citizens
16 in the court?

17 Do you think an employment contract should benefit a non-US citizen the
18 same way it benefits a US citizen?

18 Do each of you feel that you are the kind of person that you would want as a
19 juror if you had your own case in court?

20 If not, why not?

21 Is there any member of the jury who does not wish to sit on this jury for any
22 reason whatsoever?

23

Robert Tenorio Torres

Attorney at Law

1st Floor ~ D'Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 Does anyone have a reason that they would prefer not to sit, but wants to
2 keep the reason private?

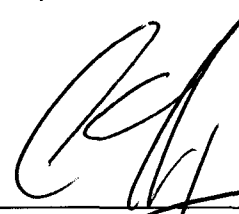
3 This is a civil trial. It is not a criminal trial. The standards of proof in a civil
4 trial such as this one are not as strict as in a criminal case. The person
5 bringing the suit need only produce evidence that preponderates in her
6 favor. If he does, then he can recover. He does not have to prove the claims
7 or his damages beyond a reasonable doubt. Does any jury member have any
8 ideas or opinions that would interfere with your ability to apply this lower
9 standard of proof that is required in a civil trial?

10 At the conclusion of this trial, the judge is going to instruct you on the law
11 as it pertains to this case and, under our system, you must follow the law in
12 deciding this case. Is there any member of the jury who feels that he or she
13 cannot follow the law for any reason, even if he or she personally may
14 disagree with the law?

15 Do you think you could follow the judge's instructions and look only at the
16 evidence in this case and follow the law as the judge gives it to you?

17 Do you think you could make a fair decision in this case?

18 Respectfully submitted this 27th day of October, 2005.

19 
20 COLIN THOMPSON, ESQ.
21 ROBERT TORRES, ESQ.
22 Attorneys for the Plaintiff
23